

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

CITY OF HOLLYWOOD ) Civ. No. 24-cv-1743 (JMB/DTS)  
FIREFIGHTERS' PENSION FUND, )  
Individually and on Behalf of All Others ) CLASS ACTION  
Similarly Situated, )  
Plaintiff, ) DECLARATION OF TIM SULLIVAN IN  
vs. ) SUPPORT OF LEAD PLAINTIFF'S  
UNITEDHEALTH GROUP INC., et al., ) UNOPPOSED MOTION FOR LEAVE TO  
Defendants. ) FILE SUPPLEMENTAL  
 ) CONSOLIDATED COMPLAINT FOR  
 ) VIOLATIONS OF THE FEDERAL  
 ) SECURITIES LAWS  
 )  
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I, TIM SULLIVAN, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of Minnesota. I am a member of the law firm of Somermeyer Sullivan PLLC, one of the counsel of record for plaintiff in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached hereto as Exhibit A is a true and correct redline copy of the [Proposed] Supplemental Consolidated Complaint for Violations of the Federal Securities Laws showing the proposed supplemental additions. Exhibit A includes numbered Exhibits 1-11, with the new OIG report and two new investigative reports as Exhibits 5-6 and 10.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 22, 2024, at Minneapolis, Minnesota.

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s/ TIM SULLIVAN  
TIM SULLIVAN